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Attorneys for Defendant
REACH MEDIA GROUP, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

DAVID TRINDADE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

REACH MEDIA GROUP, LLC, a
Delaware limited liability company,

Defendant.

CASE NO. 5:12-CV-04759 (PSG)

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO RESPOND
TO CLASS ACTION COMPLAINT AND
TO CONTINUE CASE MANAGEMENT
CONFERENCE DATE AND
CORRESPONDING DEADLINES**

Judge: Hon. Paul Singh Grewal
Dept: Courtroom 5

1 Plaintiff David Trindade ("Plaintiff") and Defendant Reach Media Group, LLC
2 ("Defendant"), stipulate and agree as follows:

3 WHEREAS:

4 A. DLA Piper LLP (US) was recently retained to represent Defendant in this matter;

5 B. Defendant's request for a 28-day extension of time to respond to Plaintiff's Class
6 Action Complaint is the first time Defendant has requested an extension of a deadline
7 in this matter;

8 C. The parties' request for a 28-day continuance of the Initial Case Management
9 Conference and corresponding deadlines is the first time the parties have requested a
10 change to any event previously scheduled by the Court in this matter;

11 D. The parties agree upon the following schedule to provide Defendant with additional
12 time in which to respond to Plaintiff's Class Action Complaint and to provide the
13 parties with additional time in which to meet and confer about their initial disclosures,
14 early settlement, ADR process selection, case management statement, and discovery
15 plan.

16
17 November 1, 2012: Last day for Defendant to respond to Plaintiff's Class Action
18 Complaint

19 November 13, 2012: Last day to meet and confer regarding initial disclosures, early
20 settlement, ADR process selection, and discovery plan; file ADR Certification signed by Parties
21 and Counsel; file either Stipulation to ADR Process or Notice of Need for ADR Phone
22 Conference

23 November 27, 2012: Last day to file Rule 26(f) Report, complete initial disclosures or
24 state objection in Rule 26(f) Report and file Case Management Statement

25 December 4, 2012: Initial Case Management Conference (CMC) in Courtroom 5, 4th
26 Floor, SJ at 2:00 p.m.

27 NOW, THEREFORE, Plaintiff and Defendant, by and through their respective counsel,
28 stipulate and agree as follows:

1 Defendant's deadline to respond to the Class Action Complaint is extended to November
2 1, 2012.

3 Subject to the approval of the Court, the Initial Case Management Conference shall be
4 rescheduled from November 6, 2012 to December 4, 2012 at 2:00 pm, or such other date and time
5 as the Court shall order, and all corresponding deadlines shall be continued by 28 days.

6
7 IT IS SO STIPULATED.

8 Dated: October 4, 2012

9 DLA PIPER LLP (US)

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11 By: /s/ Vishali Singal
12 VISHALI SINGAL
13 Attorneys for Defendant
REACH MEDIA GROUP, LLC

14 Dated: October 4, 2012

15 EDELSON MCGUIRE LLP

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17 By: /s/ Sean P. Reis
18 SEAN P. REIS
19 Attorneys for Plaintiff
DAVID TRINDADE

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1 I, Vishali Singal, am the ECF user whose identification and password are being used to
2 file the foregoing STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME. In
3 compliance with General Order 45, X.B., I hereby attest that the above-referenced signatories to
4 this stipulation have concurred in this filing.

5 **ORDER**

6 Defendant Reach Media Group, LLC's deadline to respond to the Class Action
7 Complaint is hereby extended to November 1, 2012.

8 The parties' Initial Case Management Conference is hereby extended to
9 _____, 2012 at _____, and all corresponding dates are hereby
10 continued by 28 days.

11
12 IT IS SO ORDERED.

13
14 DATED: _____, 2012

15 By _____
16 HONORABLE PAUL SINGH GREWAL
17 UNITED STATES MAGISTRATE JUDGE
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